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The case does not go to the length of holding that nothing but actual capture by men-of-war would be within the policy, but seems to require at least such imminent peril of capture as to force the ship to take refuge in a neutral port in order to escape. The English courts have apparently adopted a stricter rule of construction for such cases than the American courts. For discussion of similar questions, see (1917) 26 YALE LAW JOURNAL, 247, 791; 28 *ibid.* 130.

INTERNATIONAL LAW—NATIONALITY—EFFECT OF MOTHER'S NATURALIZATION BY MARRIAGE ON NATIONALITY OF HER CHILDREN.—A and B, the children of a Belgian widow, who had married C, a Frenchman, were adopted by C and applied for registration in France as his adopted children. On refusal to register them on the ground that according to French law foreigners could not be adopted in France, it was *held*, that they were French and should be registered. *In re Hollaender and Donnet*, Court of Rouen, Sept. 8, 1916, reported in (1917) 44 CLUNET, 1009.

For an American case to the same effect see *Brown v. Shilling* (1856) 9 Md. 74. In most countries citizenship is conferred on minor children by the naturalization of the father or the widowed mother. Marriage of an alien woman to a citizen is a method of naturalization. *Mackenzie v. Hare* (1915) 239 U. S. 299. Adoption is not like marriage in this respect, and citizenship is not conferred on an alien child by his adoption by an American citizen. 3 Moore, *Digest of International Law*, sec. 415.

RULE AGAINST PERPETUITIES—REVERSIONARY LEASE TO BEGIN MORE THAN TWENTY-ONE YEARS IN FUTURE.—A lessee was in possession under a lease having nearly fifty years to run. The owner in fee of the reversion made a second lease of the premises to the same lessee for a term of thirty years, to begin immediately on the expiration of the existing lease. *Held*, that the second lease did not violate the rule against perpetuities. *Mann, Crossman & Paulin, Ltd. v. Registrar* (1917, Ch. D.) 117 L. T. Rep. N. S. 705.

This seems to be the first direct decision on the point involved. The question is discussed by Mr. Edwin H. Abbot, Jr., in his article in this number on *Leases and the Rule against Perpetuities* (page 880, *supra*). The above decision is in accord with the views there expressed.

SALES—RESCISSION FOR FRAUD—EFFECT OF VENDOR'S REFUSAL TO ACCEPT TENDER OF GOODS.—The defendant induced the plaintiff to buy goods by fraudulent representations that he owned them. On discovering the fraud, the plaintiff promptly offered to return the goods and demanded that the purchase price be refunded. The defendant refused to do so. The plaintiff sued to recover the purchase price. *Held*, (Smith, J., dissenting) that the plaintiff was not entitled to recover the purchase price. *Kennedy v. Hasselstrom* (1918, S. D.) 166 N. W. 231.

The view of the dissenting judge seems obviously correct. In the case of sales of chattels induced by fraudulent misrepresentations, the law is well settled that the misrepresentee has a legal power by appropriate notice and tender to the misrepresenter to bring about a rescission. *Tilley v. Bowman, Ltd.* [1910] 1 K. B. 745.

WILLS—CONSTRUCTION—POWERS OF LIFE TENANT.—A codicil to a will gave one to whom the will gave only a life estate the power "to execute and deliver deeds of conveyance and absolute title" to the property whenever the devisee of the life estate "believed it to be of advantage to sell the same." The life tenant filed a bill in equity asking the court to construe the will, making the